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February 8, 2019

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Marlene H. Dortch, Commission Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Annual 64.2009(e) CPNI Certification AMERIMEX SOLUTIONS, INC.

Form 499 Filer ID: 830934 EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AMERIMEX SOLUTIONS, INC. hereby submits its Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

If you have any questions or if we may provide you with additional information, please contact our office at the above address, e-mail, or telephone number. Thank you for your attention to this matter.

Respectfully submitted,

Lance J.M. Steinhart, Esq. Managing Attorney
Lance J.M. Steinhart, P.C.

Attorneys for AMERIMEX SOLUTIONS, INC.

Enclosures

cc: Donald Aldridge

#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 8, 2019

Name of company covered by this certification: AMERIMEX SOLUTIONS, INC.

2. Form 499 Filer ID: 830934

3. Name of Signatory: Donald Aldridge

4. Title of Signatory: Chief Executive Officer

5. Certification:

I, Donald Aldridge, Chief Executive Officer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification as Exhibit "A" is an accompanying statement explaining how AMERIMEX SOLUTIONS, INC.'s procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

AMERIMEX SOLUTIONS, INC. has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

AMERIMEX SOLUTIONS, INC. has not received customer complaints in the past year concerning the unauthorized release of CPNI.

AMERIMEX SOLUTIONS, INC. represents and warrants that the above certification is consistent with 47. C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Name: Donald Aldridge

Title: Chief Executive Officer

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# Annual 47 C.F.R. § 64.2009(e) CPNI Certification <u>EB Docket 06-36</u>

Exhibit A

AMERIMEX SOLUTIONS, INC.

## AMERIMEX SOLUTIONS, INC. 200 Mansell Court East, Suite 105 Roswell, Georgia 30076

#### DESCRIPTION OF CPNI OPERATING PROCEDURES AND POLICIES

Amerimex Solutions Inc. ("Amerimex" or "the Company") operates **solely as debit card provider and as such provides casual calling services to transient users** with whom it does not have a subscriber relationship. Therefore, it does not have any information that relates to the quantity, technical configuration, type, or location or the customer's service and most often does not even know the customers' billing name and address. Because the service is provided outside of any subscribed service relationship, the Company does not obtain any CPNI that can be used for marketing purposes.

Amerimex does have call detail information concerning the calls made using the Company's debit cards. This information is not made available to customers over the telephone or in person. However, for the small percentage of customers that sign up online, Amerimex has instituted authentication procedures to safeguard the disclosure of CPNI on-line. Amerimex's authentication procedures do not require the use readily available biographical information or account information as declined by the FCC. Amerimex authenticates customers by customer entering a customer provided user name and password. All customers are required to establish a password without the use or readily available biographical information or account information if they want to have on-line access to their CPNI. Unless the appropriate password is provided. Amerimex does not allow on-line access to CPNI.

Amerimex has established back-up authentication procedures for lost or stolen password that do not prompt the customer for readily available biographical information or account information. Company's back-up authentication procedure is Customer must request their password and the password is sent via e-mail to the Customer's previously provided e-mail address.

The Company has put into place procedures to notify customers whenever a password is changed without revealing the changed information or sending the notification to the new account information. The Company sends a text message to the customer's telephone number of record informing them their password has been changed.

The Company has processes in place to safeguard the call detail information that it obtains through the use of its debit cards from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records.

The Company has procedures in place to notify law enforcement in the event of a breach of the call detail records that it obtains from its provision of debit card service.

Since the Company does not have presubscribed customers, it would not have the ability to notify customers of any such breach.

Amerimex has not had any such breaches during 2018, but has a process in place to maintain electronic records or any breaches discovered and notifications made to the USSS and the FBI.

Amerimex has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release or disclosure of call detail records in calendar year 2018.

Due or the nature of its business, Amerimex does not believe that pretexters would attempt to gain access to the call detail records that it obtains from the provision of debit card service, because the call details are not tied to presubscribed customers. Accordingly, the Company has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.